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MEMO ENDORSED

March 24, 2025

VIA ECF

Honorable Victoria Reznik
United States District Court
Southern District of New York
300 Quarropas Street
White Plains, NY 10601

Re: *Nash v. Commissioner of Social Security*
Civil Action No. 7:25-cv-00022-VR

Dear Judge Reznik,

We write on behalf of our client, Francine Nash, with the consent of the defense, to request a 75-day extension to file her motion for judgment on the pleadings which is currently due on April 2, 2025, per the Court's January 3, 2025 Standing Scheduling Order. This is the parties' first request for an extension. Plaintiff's counsel needs additional time due to a heavy caseload in the next several weeks.

After conferring with the defendant, the parties have agreed to proceed according to the following amended scheduling order, subject to the Court's approval:

- Plaintiff to file her motion for judgment on the pleadings on or before: **June 16, 2025;**
- Defendant to file its response to plaintiff's motion/cross motion on or before: **August 29, 2025;** and
- Plaintiff to file her reply, if any, on or before: **September 12, 2025.**

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Thank you for your consideration of this request.

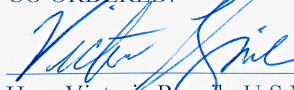
Respectfully submitted,

s/Daniel A. Osborn
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cc: Kristina Danielle Cohn, Esq. (by ECF)

The parties' request is **GRANTED**.
The deadlines are so modified as
outlined in this joint letter. The Clerk
of Court is respectfully directed to
close out the gavel associated with
ECF No. 9.

SO ORDERED.



Hon. Victoria Reznik, U.S.M.J.

Dated: 3-25-25